

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

v.

STATE OF NEW YORK; KATHLEEN HOCHUL,  
Governor of New York, in her official capacity;  
LETITIA A. JAMES, Attorney General of New  
York, in her Official Capacity; MARK J.  
SCHROEDER, Commissioner of the New York  
State Department of Motor Vehicles, in his Official  
Capacity,

Defendants.

Civil Action No. 25-cv-205 (AMN)  
(MJK)

**NOTICE OF MOTION FOR LEAVE TO FILE *AMICUS* BRIEF IN SUPPORT OF  
DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

**PLEASE TAKE NOTICE** that upon the accompanying memorandum of law and attached exhibits, *amicus curiae* Rural and Migrant Ministry Inc., The New York Immigration Coalition, Hispanic Federation, Make the Road NY, and LatinoJustice PRLDEF, by their undersigned attorneys, will move this Court, before the Honorable Anne M. Nardacci, at the James T. Foley United States Courthouse, 445 Broadway, Albany, New York 12207, at a date and time to be designated by the Court, for leave to file an *amicus* brief in support of Defendants' motion to dismiss the Complaint in this action, pursuant to the United States District Court for the Northern District of New York's Local Rule of Practice 7.2, and for such other and further relief as the Court may deem just and proper.

Dated: New York, New York  
April 1, 2025

**RURAL AND MIGRANT MINISTRY, INC.,  
NEW YORK IMMIGRANT COALITION,**

**HISPANIC FEDERATION, LATINOJUSTICE  
PRLDEF AND MAKE THE ROAD NEW YORK**

***By their attorneys,***

By: /s/ Kathleen A. Reilly

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

Dated: April 1, 2025

/s/ Kathleen A. Reilly